

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERAL TRADE COMMISSION and PEOPLE OF THE
STATE OF ILLINOIS,

Plaintiffs,
v.

ACIA17 Automotive Inc., a Delaware corporation, d/b/a
LEADER AUTOMOTIVE GROUP., et al.,

Defendants.

Case No. 24-cv-13047

Judge Jorge L. Alonso

Magistrate Judge Daniel P.
McLaughlin

**SECOND DECLARATION OF RACHEL F. SIFUENTES IN SUPPORT OF
PLAINTIFF FTC'S MOTION TO COMPEL AND FOR AN ORDER TO SHOW CAUSE**

I, Rachel F. Sifuentes, declare as follows:

1. I am employed by the Federal Trade Commission ("FTC") and am an attorney representing the FTC in this case. I am a member of good standing in the State of Illinois Bar and in the Trial Bar of the United States District Court for the Northern District of Illinois. The following facts are within my personal knowledge, and if called as a witness I could competently testify thereto:

2. On January 20, 2026, Defendant Douvas served Plaintiffs' counsel with revised redacted documents identified in his revised privileged log, via email. A true and correct copy of the January 20, 2026 email is attached hereto as **Attachment K**.

Dated: January 23, 2026

/s/ Rachel F. Sifuentes
Rachel F. Sifuentes
Attorney for Plaintiff
FEDERAL TRADE COMMISSION